

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

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|---------------------------------|---|-------------------------------|
| FAIR ISAAC CORPORATION, a |) | Case No. 16-cv-1054 (WMW/DTS) |
| Delaware corporation, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | |
| |) | |
| FEDERAL INSURANCE COMPANY, |) | |
| an Indiana corporation, and ACE |) | |
| AMERICAN INSURANCE |) | |
| COMPANY, a Pennsylvania |) | |
| corporation, |) | |
| |) | |
| Defendants. |) | |

**DECLARATION OF HEATHER J. KLIEBENSTEIN IN SUPPORT OF
PLAINTIFF FAIR ISAAC CORPORATION'S MEMORANDUM IN SUPPORT
OF MOTION TO EXCLUDE TESTIMONY OF W. CHRISTOPHER BAKEWELL**

I, Heather J. Kliebenstein, declare as follows:

1. I am a shareholder with Merchant & Gould P.C., and I am one of the attorneys of record for Plaintiff Fair Isaac Corporation in the above captioned matter.
2. I make this declaration on my own information, knowledge, and belief in support of Plaintiff's Motion to Exclude Testimony of W. Christopher Bakewell.
3. Attached hereto as Exhibit 1 is a true and correct copy of the Expert Report of W. Christopher Bakewell, served on May 17, 2019. This document is filed UNDER SEAL.
4. Attached hereto as Exhibit 2 is a true and correct copy of Expert Report of Neil J. Zoltowski, served April 19, 2019. This document is filed UNDER SEAL.

5. Attached hereto as Exhibit 3 is a true and correct copy of the transcript of the June 28, 2019 deposition of W. Christopher Bakewell. This document is filed UNDER SEAL.

6. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the transcript of the June 25, 2019 deposition of Steven Kursh. This document is filed UNDER SEAL.

7. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the transcript of the March 25, 2019 deposition of Kevin Harkin. This document is filed UNDER SEAL.

Dated: July 26, 2019

/s/ Heather J. Kliebenstein
Heather J. Kliebenstein